

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

THOMAS FARMER,
Defendant.

Criminal No. 03:13-cr-00162 (DRD)

JOINT NOTICE OF COMPLIANCE WITH COURT'S DECEMBER 5, 2014 ORDER

On December 5, 2014, the Court vacated a hearing scheduled for December 9, 2014 and ordered the parties to “confer and agree upon at least five proposed dates and times of availability to hold the hearing.” (Dkt. 286). The parties have conferred and propose the following to the Court.

Because one of the agents who may testify at the hearing is currently stationed overseas until mid-January 2015, and another agent witness is scheduled to testify in a different trial in early January, the government is unable to produce all of the requested witnesses until the week of Monday, January 19. Because that Monday is a federal holiday, the hearing cannot be held on that day. The pretrial conference in this case is currently scheduled for Tuesday, January 20 at 5:00 p.m. Jury selection is scheduled to start on Monday, January 26 at 9:00 a.m.

If the Court intended the parties to propose five different “times” for the hearing, then the parties propose: (i) the morning of Wednesday, January 21; (ii) the afternoon of Wednesday, January 21; (iii) the morning of Thursday, January 22; (iv) the afternoon of Thursday, January 22; or (v) any time on Friday, January 23. The parties prefer one of those times in order to keep the scheduled date for jury selection on Monday morning, January 26. If the Court instead intended the parties to propose five different “dates” for the hearing, then the parties propose:

(i) January 20; (ii) January 21; (iii) January 22; (iv) January 23; or (v) January 26, which may postpone jury selection and the start of trial by one day.

DATED: December 9, 2014.

Respectfully submitted,

/s/ Terrance G. Reed

Terrance G. Reed (Pro Hac Vice)
V. Thomas Lankford (Pro Hac Vice)
Lankford & Reed, PLLC
120 N. St. Asaph Street
Alexandria, VA 22314
(Phone) 703-299-5000
(Facsimile) 703-299-8876
tgreed@lrfirm.net
vtlankford@lrfirm.net

/s/ Jon B. Jacobs

Craig Y. Lee, PR Attorney #G01208
Jon B. Jacobs, PR Attorney #G01508
Trial Attorneys
U.S. Department of Justice
Antitrust Division
450 5th St., NW Suite 11300
Washington, DC 20530
Tel: (202) 514-5012
Fax: (202) 514-6525
jon.jacobs@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2014, a true and correct copy of the foregoing “JOINT NOTICE OF COMPLIANCE WITH COURT’S DECEMBER 5, 2014 ORDER” was filed electronically and to the best of my knowledge, information and belief, counsel for defendant will be notified through the Electronic Case Filing System.

/s/ Jon B. Jacobs
Craig Y. Lee, PR Attorney #G01208
Jon B. Jacobs, PR Attorney #G01508
Trial Attorneys
U.S. Department of Justice
Antitrust Division
450 5th St., NW Suite 11300
Washington, DC 20530
Tel: (202) 514-5012
Fax: (202) 514-6525
Email: jon.jacobs@usdoj.gov